



**U.S. Department of Justice**

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District of Massachusetts*

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July 27, 2004

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**Re: United States v. Raymond Asselin, Sr., et al.  
CR-N-04-300 -MAP**

Dear Counsel:

This letter shall respond to your request for automatic discovery under the Local Rules.

**A. Discovery Pursuant to Fed.R.Crim.Pro. 16(a)(1)(A) - (D)**

**1. Statements of the Defendant**

- a. IRS Memorandum of Interview of Raymond Asselin, Sr., dated 12/20/01 (4 pages);
- b. HUD Report of Raymond Asselin, Sr., dated 08/27/02 and 08/28/02 (3 pages);
- c. Letter of Resignation, dated 04/10/03, for Raymond Asselin, Sr. (1 page);
- d. FBI 302 of Arthur Sotirion, dated 08/29/02 (2 pages);
- e. Grand jury testimony of Arthur Sotirion, dated 09/05/02 (6 pages);
- f. FBI 302 of Peter Davis, dated 04/10/03 (2 pages);
- g. FBI 302 of Paul Bannick, dated 03/03/03 (1 page);
- h. Grand jury testimony of Paul Bannick, dated 03/18/03 (6 pages);
- i. HUD Report of Paul Bannick, dated 07/12/04 (3 pages);
- j. HUD Report of James Asselin, dated 06/21/01 (2 pages);
- k. HUD Report of James Asselin, dated 08/29/01 (2 pages);
- l. FBI 302 of James Asselin, dated 11/08/01 (2 pages - redacted);
- m. FBI 302 of James Asselin, dated 11/08/01 (5 pages);
- n. IRS Memorandum of Interview of James Asselin, dated 11/08/01 (2 pages); and,
- o. FBI 302 of James Asselin, dated 04/25/02 (3 pages).

**2. Defendants' Prior Record**

NCIC printouts of all defendants enclosed.

**3. Documents and Tangible Objects**

The FBI is currently in possession of documents, imaged computer hard drives, photographs and other tangible objects received pursuant to grand jury subpoena, search warrant, and/or consent search. Please schedule an appointment with this office to arrange for a review of these materials.

After a review of these materials, you may designate those documents that you wish to have copied. Copies may be obtained by making arrangements with a local copy center.

**4. Reports of Examinations and Tests**

None.

**B. Search Materials**

**1. Search Warrant Applications, Affidavits, and Returns**

16 Dwight and 1176 Main Street Search Nos. 02m624A,BKPN

- a. Search warrant;
- b. Search warrant application and affidavit;
- c. Search warrant returns;

115 Mayfair Avenue - Search No. 02m663KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit, and Attachment A;
- c. FBI 302 (one page), dated 09/27/02, with Form 597 (two pages);
- d. FBI 302 (three pages), dated 10/04/02, with photographic log (six pages), diagram/sketch (five pages) and evidence recovery log (two

pages);

- e. Search warrant return;

56 Stage Island Road - Search No. 02m664KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit signature page, and Attachment A (affidavit identical to B.1.b.);
- c. Search warrant return;

184 Bowles Park - Search No. 02m665KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit signature page, and Attachment A (affidavit identical to B.1.b.; and Attachment A;
- c. FBI 302 (eight pages), dated 09/27/02, with Form 597 (two pages);
- d. Search warrant return;

25 Saab Court - Search No. 02m666KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit signature page, and Attachment A (affidavit identical to B.1.b.; and Attachment A;
- c. FBI 302 (one page), dated 09/27/02, with Form 597 (five pages);
- d. FBI 302 (one page), dated 09/27/02, with photographic log (two pages), evidence recovery log (three pages), and diagram/sketch (two pages);
- e. Search warrant return;

140 Salli Circle - Search No. 02m667KPN

- a. Search warrant and Attachment A;

- b. Search warrant application, affidavit signature page, and Attachment A (affidavit identical to B.1.b.; and Attachment A;
- c. FBI 302 (one page), dated 09/27/02;
- d. FBI 302 (one page), dated 09/27/02, regarding seizure of briefcase;
- e. IRS Memorandum of Activity, dated 09/27/02;
- f. Search warrant return;

518 Old Farm Road - Search No. 02m668KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit signature page, and Attachment A (affidavit identical to B.1.b.; and Attachment A;
- c. FBI 302 (one page), dated 09/27/02, with photographic log (six pages), evidence recovery log (one page), and diagram/sketch (five pages);
- d. FBI 302 (one page), dated 09/27/02, with Form 597(one page);
- e. Search warrant return;

40 Santa Maria - Search No. 02m669KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit signature page, and Attachment A (affidavit identical to B.1.b.; and Attachment A;
- c. FBI 302 (two pages), dated 09/27/02, regarding surveillance;
- d. FBI 302 (one page), dated 09/27/02, with photographic log (three pages), diagram/sketch (four pages), and Form 597(two pages);
- e. Search warrant return;

16 Dwight Road - Search No. 02m670KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit signature page, and Attachment A (affidavit identical to B.1.b.; and Attachment A;
- c. FBI 302 (two pages), dated 09/27/02, regarding execution of search warrant;
- d. FBI 302 (three pages), dated 09/27/02, with Form 597 (one page);

811 Dickinson - Search No. 03m612KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit, and Attachment A;
- c. FBI 302 (one page), dated 01/29/03, with diagram/sketch (three pages);
- d. Search warrant return;

42 Old Barn Road - Search No. 03m660KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit, and Attachment A;
- c. FBI 302 (one page), dated 06/16/03; with Form 597 (one page);
- d. Search warrant return;

20 River Street - Search No. 03m664KPN

- a. Search warrant and Attachment A;
- b. Search warrant application, affidavit, and Attachment A;
- c. FBI 302 (one page), dated 07/02/03; with Form 597 (two pages);

d. Search warrant return;

**2. Written Description of Consent Searches and Inventory**

Consent to search form, dated 8/29/02 signed by Reverend Christopher Stamas.

Consent to search form, dated 9/27/02, with photographic log (one page) and Form 597 (one page) signed by Petra Cervoni.

**C. Electronic Surveillance**

**1. Written Description of Any Intercept**

None.

**2. Statement Whether or Not the Government Intends to Offer Intercepts in its Case-in-Chief**

Not Applicable.

**3. Title III Applications, Affidavit, and Court Orders**

None.

**D. Consensual Intercepts**

**1. Written Description of Any Intercept**

Lisa Asselin and James Rosemond recorded various conversations with a number of the charged defendants between on or about July 28, 2002 through on or about April 10, 2003. An index of the taped conversations has been included. Those entries blacked out contain conversations of individuals who have not been charged in this case.

Copies of these recordings may be obtained by supplying this office with four blank sixty minutes cassette tapes capable of being recorded on both sides, which were used in lieu of CD 1, and sixty-five blank CDs.

**E. Known Unindicted Co-conspirators**

Identified under separate cover.

**F. Identifications**

1. **Written Statement Whether or Not Used for Any Witness**

None.

2. **Evidence Reflecting Identification Procedure**

None.

**G. Exculpatory Information, Promises, Rewards or Inducements**

Identified under separate cover.

Very truly yours,

MICHAEL J. SULLIVAN  
United States Attorney

By:

  
WILLIAM M. WELCH II  
Assistant United States Attorney

enc.

cc: Court clerk